

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

William Riley-El,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 15 CV 11180
	)	
Salvador Godinez, et al.,	)	Honorable Judge John Z. Lee
	)	
Defendants.	)	Magistrate Judge Young B. Kim

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants Clarence Wright, Joel Shaw, Joshua Clements, Kevin Laskey, Jenny McGarvey, Michael Range, Charles Best, David Mansfield, Tarry Williams, Cherry Marshall, Theodore Fredericks, Jill Hosselton, and Nicholas Lamb (“Defendants”), by and through their attorney, Kwame Raoul, Attorney General of Illinois, and pursuant to Fed. R. Civ. P. 56, move this Court for an order granting summary judgment in their favor. In support thereof, Defendants state the following:

1. Plaintiff William D. Riley El (“Plaintiff”) is an inmate in the custody of the Illinois Department of Corrections (“IDOC”) at Stateville Correctional Center (“Stateville”).
2. Plaintiff brought this lawsuit pursuant to 42 U.S.C. § 1983 alleging three counts of retaliation, in violation of his First Amendment rights, against thirteen current and former employees of the IDOC. Specifically, Plaintiff believes that Defendants issued disciplinary tickets against him in retaliation for prior grievances and complaints he filed.
3. However, the evidence shows that none of the Defendants actions were motivated by Plaintiff’s prior speech, nor did they cause Plaintiff to suffer a deprivation likely to deter future First Amendment activity.

4. In addition, the evidence shows that all of the Defendants acted with reasonable, non-retaliatory purposes; therefore, Plaintiff fails to demonstrate that the alleged deprivations would not have occurred in the absence of his prior protected activity.

5. Accordingly, the Defendants are entitled to judgment as a matter of law as to all claims against them in Plaintiff's Amended Complaint.

WHEREFORE, based on the foregoing, as well as the arguments set forth in their supporting Memorandum of Law, Defendants Wright, Shaw, Clements, Laskey, McGarvey, Range, Best, Mansfield, Williams, Marshall, Fredericks, Hosselton, and Lamb respectfully request that this Honorable Court enter summary judgment in their favor, dismiss Plaintiff's Amended Complaint with prejudice, and grant any such further relief that the Court deems necessary and just.

Respectfully submitted,

KWAME RAOUL  
Attorney General for Illinois

/s/ Colleen M. Shannon  
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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on March 25, 2019, the above and foregoing document was electronically filed using the Court's CM/ECF system, and a copy was also served on Plaintiff at the address below via U.S. mail.

William Riley-El #B-03069  
Stateville Correctional Center  
P.O. Box 112  
Joliet, Illinois 60434

/s/ Colleen M. Shannon